

**From:** [Stephen Bosak](#)  
**To:** [Brian Bardwell](#)  
**Cc:** [Matthew Dooley](#); [Michael Briach](#); [Amy Joyce](#); [Anna Melinyshyn](#)  
**Subject:** Williamson v. Lorain County, et al. - Case No. 1:23-cv-01507 (N.D. Ohio)  
**Date:** Wednesday, July 10, 2024 12:07:00 PM  
**Attachments:** [Defendant David Moore's Responses to Requests for Inspection.pdf](#)  
[Defendant Matt Lundy's Responses to Requests for Inspection.pdf](#)

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Brian:

Attached are RFP responses for Moore and Lundy. Tom Williams's responses are coming shortly but given that he had no authority to terminate Mr. Williamson's employment, his continued presence as a defendant in this lawsuit is tenuous at best.

Regarding document production, my understanding is that you have (and have had) LDS00001-LDS036596 and an additional supplemental production dated November 3, 2022. I also understand that you have Williams0001-0021. Because your current requests are substantively identical to your requests from the state case, it seems clear that you have had all potential responsive documents related to the Defendants for almost two years. Obviously, your pending motion to compel fails to inform the Court that you already have responsive documents. It further fails to inform the Court that Mr. Williamson took the same extended period of time to respond to discovery, which was outside the time permitted under the Federal Rules. My assumption is that Mr. Williamson does not believe that his asserted objections are waived by this passage of time—particularly given that the delay for both parties was likely caused by uncertainty regarding what claims would survive.

Likewise, your motion to compel fails to include a Rule 37 certification because you never attempted to confer in good faith. Instead, you rushed to file your motion rather than just talking to us. I'd again urge you to withdraw your motion, which is procedurally and substantively invalid. You can dismiss it without prejudice. If you believe the current document production or discovery responses are deficient, we can discuss. I'll call you at 3pm today.

Thanks,  
Stephen

Stephen M. Bosak | DGMP | 440.930.4001

<b>EXHIBIT</b> <b>C</b>
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